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12 Attorneys for Plaintiff
ARTHUR J. GALLAGHER & CO.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

17 ARTHUR J. GALLAGHER & CO., a) CASE NO.: 20-cv-05505-EMC
18 Delaware Corporation,)
19 Plaintiff,)
20 vs.)
21 DON TARANTINO, an individual,)
22 BERNADETTE HEATER, an individual,)
23 MICHAEL MACHETTE, an individual, and)
24 SPENCER BRUSH, an individual,)
25 Defendants.)

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Plaintiff Arthur J. Gallagher & Co. ("Gallagher") hereby
3 respectfully requests that an order be granted to remove Docket No. 82-3 from the ECF docket for
4 this matter on the grounds that it was incorrectly filed publicly and not under seal.

5 Gallagher e-filed Docket No. 82-3 (hereafter "McMeel Declaration Part 2") on April 7, 2022
6 as a part of Gallagher's opposition to the defendants' motion for partial summary judgment.
7 Exhibit 37 within the McMeel Declaration Part 2 is comprised of information that Alliant Insurance
8 Services, Inc. has designated as highly confidential. Exhibit 37 was inadvertently omitted from
9 Gallagher's Administrative Motion to Consider Whether Others' Material Should be Sealed (ECF
10 No. 81 at 4-5), and an unsealed version of Exhibit 37 was thus inadvertently included in the version
11 of the McMeel Declaration Part 2 that Gallagher filed publicly. An unredacted version of Exhibit
12 37 was submitted to the Court under seal as a part of Docket No. 81-5.

13 Gallagher is following all steps outlined in the Court's online guidance to remedy this issue:
14 it has emailed a notification of the above issue to the Court's docket correction email address, it has
15 filed a corrected version of Docket No. 82-3 (see ECF No. 85), and it is working with the ECF
16 HelpDesk to temporarily lock Docket No. 82-3.

17 Gallagher therefore respectfully moves the Court to remove Docket No. 82-3 permanently
18 from the Court's public docket and ECF.

19 Dated: April 13, 2022

20 By: _____ /s/ Meghan R. McMeel _____

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23 Attorneys for Plaintiff
24 ARTHUR J. GALLAGHER & CO.

[PROPOSED] ORDER

The Court has now considered Plaintiff Arthur J. Gallagher & Co.'s Motion to Remove Incorrectly Filed Document. Having considered the moving papers before it and finding good cause,

The Court hereby grants the Motion and orders that Docket No. 82-3 be removed from the docket for this matter.

IT IS SO ORDERED.

Dated: _____

By: _____

Hon. Edward M. Chen
United States District Judge